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BEFORE THE MAY 19 PM 4:36
FEDERAL ELECTION COMMISSION

Courtney White

Howell, MI 48843

Complainant,

OFFICE OF GENERAL
COUNSEL

CELA
MUR # 7071

v.

Representative Mike Bishop
P.O. Box 1148
Brighton, MI 48116

Mike Bishop for Congress and Valerie Tillstrom, Treasurer
P.O. Box 1148
Brighton, MI 48116

Respondents.

COMPLAINT

Complainant files this complaint with the Federal Election Commission (the "FEC" or "Commission") under 52 U.S.C. § 30109(a)(1) against Representative Mike Bishop and his authorized committee, Mike Bishop for Congress and, its treasurer, Valerie Tillstrom, in her official capacity (collectively, "Respondents") for violating the Federal Election Campaign Act of 1971, as amended ("the Act") and FEC regulations. As this Complaint details, Representative Bishop and his authorized committee, Mike Bishop for Congress, have misled the public by failing to include any disclaimer at all on Respondents' contribution website page located at <https://rally.org/covers/b9PEeeJfoN5/contribute>. The Commission should act immediately to investigate the full scope of this violation, ensure it ceases immediately, and seek the appropriate financial penalties.

A. FACTS

Representative Mike Bishop is a candidate for reelection to the United States House of Representatives.¹ Mike Bishop for Congress is the Congressman's principal campaign committee.² On March 29, 2016, Respondents sent an email to voters asking that they contribute to the Congressman's campaign.³ Respondents' email included a link to Respondents' website page on www.rally.org that appears to have been created to raise funds specifically for Representative Bishop's campaign.⁴ However, that website does not identify who paid for it.⁵

B. LEGAL DISCUSSION

Under the Act, when a political committee solicits a contribution through any type of general public political advertising, the communication must state that it is paid for by the authorized political committee.⁶ Moreover, the Commission's regulations clearly state that all Internet websites of political committees available to the general public must contain a disclaimer explaining whether the communication was authorized and/or paid for by a candidate, candidate's committee, or agent thereof.⁷ A communication that is authorized by a candidate, authorized committee of a candidate, or an agent thereof must contain a disclaimer that clearly states that the communication was paid for by the authorized political committee of the candidate.⁸

Here, in blatant violation of the Commission's rules, Respondents failed to include any disclaimer at all on the campaign's website at www.rally.org, an Internet website which is

¹ FEC Form 2, Mike Bishop Statement of Candidacy (Jan. 01, 2015), <http://docquery.fec.gov/pdf/261/15970255261/15970255261.pdf>.

² *Id.*

³ See Exhibit A.

⁴ *Id.* See also <https://rally.org/covers/b9PEccJfoN5/contribute>.

⁵ See Exhibit B.

⁶ 52 U.S.C. § 30120(a)(1).

⁷ See 11 C.F.R. § 110.11(a)(1), (b)(1).

⁸ *Id.* § 110.11(b)(1).

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available to the general public. Disclaimers are required under the Act to keep the public informed and to hold campaigns accountable. By failing to include the required disclaimer, Respondents are not only misleading the public about who paid for their webpage on www.rally.org, but are also clearly violating the law. Because Respondents have violated 52 U.S.C. 30120(a) and 11 C.F.R. § 110.11(b) by failing to include any disclaimer on their contribution page at www.rally.org, the FEC should undertake an immediate investigation.

C. REQUESTED ACTION

As we have shown, it is likely that Respondents have violated the Act and Commission regulations. We respectfully request that the Commission investigate these apparent violations, including whether they were knowing and willful. Should the Commission determine that Respondents have violated the Act, we request that Respondents be enjoined from further violations and be fined the maximum amount permitted by law.

Sincerely,

Courtney E. White

SUBSCRIBED AND SWORN to before me this 10 day of July 2016.

Amber Perry

Notary Public

My Commission Expires: 07/07/22

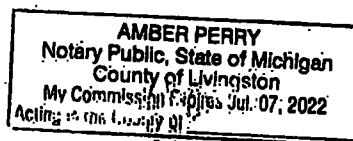


EXHIBIT A

1704441-100015

From: breaking@electmikebishop.com <breaking@electmikebishop.com>
Date: Tue, Mar 29, 2016 at 11:11 AM
Subject: Target: Michigan
To: XXXXXXXXXX



POLITICO: DEMOCRATS FOCUSING ON MICHIGAN

I want to make sure you saw this breaking news: **Washington Democrats have made Michigan the centerpiece of their strategy to retake the House in November.**

This means that Mike Bishop's race will be one of the most important races in the country this November.

Our upcoming FEC fundraising deadline is in just three days, and we are still short of our goal. If we can't raise another \$12,450 by **midnight on Thursday**, we will be giving the Democrats a huge advantage just as the election is heating up.

Chip in today to make sure we don't fall short.

Nancy Pelosi's plan to replace Mike with someone who supports her extreme liberal vision for America rests on outspending us this November. **With help from our grassroots network, we won't allow that to happen.**

Use this secure link to chip in today and help us reach our goal:
<https://rally.org/covers/b9PEeeJfoN5/contribute>

Thank you,

Team Bishop

CONTRIBUTE

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Paid for by Mike Bishop for Congress

Contributions are not tax-deductible for federal income tax purposes. Federal law limits contributions to \$5,400 per person (\$2,700 for the primary election, \$2,700 for the general election). No corporate contributions or contributions from foreign nationals or cash donations, please. Federal law requires us to use our best efforts to collect and report the name of employer for each individual who contributions aggregate in excess of \$200 in a calendar year.

Unsubscribe

EXHIBIT B

Creditors at Particular Meetings

**USDOJ vs
SEC & FTC
9/10/2008**

Chum, Amur

Partnership

Your Information

APPENDIX

1. **Product Name:** *Product Name*
 2. **Product Code:** *Product Code*
 3. **Product Description:** *Product Description*
 4. **Product Price:** *Product Price*
 5. **Product Quantity:** *Product Quantity*
 6. **Product Status:** *Product Status*
 7. **Product Category:** *Product Category*
 8. **Product Subcategory:** *Product Subcategory*
 9. **Product Manufacturer:** *Product Manufacturer*
 10. **Product Supplier:** *Product Supplier*
 11. **Product Date:** *Product Date*
 12. **Product Time:** *Product Time*
 13. **Product Location:** *Product Location*
 14. **Product Contact:** *Product Contact*
 15. **Product Notes:** *Product Notes*

2015-2016

4

PLATE 1

Chemical synthesis

1. The first step is to identify the problem or question that needs to be answered. This involves understanding the context and the specific requirements of the task.

(A) Example 1

1. *For the purpose of this Act, the term "person" shall include any individual, partnership, firm, company, association, or corporation.*
 2. *For the purpose of this Act, the term "property" shall include any real or personal property, whether movable or immovable, and any interest in such property.*
 3. *For the purpose of this Act, the term "trust" shall include any arrangement whereby a person transfers property to another person for the purpose of enabling that other person to hold the property for the benefit of the first person or for the benefit of any other person.*

☐ I have read the above information and understand it.

☐ I have read the above information and understand it.

Amount
\$25.00 USD

111

11/20/2007

[illegible]

Bottom of Page on www.rally.org

1704441-M0000

Payment Information

CARD NUMBER

EXPIRATION DATE

SECURITY CODE

NAME & ADDRESS

THIS CARDWILL BE USED TO PAY FOR YOUR CONTRIBUTION

- ☐ Make this a recurring contribution
- ☐ Make your contribution from everyone except the only member

Amount \$25.00 USD

STAVELAND RACE

Your donation will appear on your credit card or bank statement as "STAVELAND RACE". By submitting your contribution you agree to the Rally.org terms of service and privacy policy.